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Attorneys for Defendant
APWU-AFL-CIO

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ROSEMARY GARITY,

Plaintiff

vs.

APWU-AFL-CIO, APWU Local #7156, USPS
PMG PATRICK DONAHOE

Defendant.

CASE No. 2:11-cv-01110-KJD-GWF

UNOPPOSED MOTION FOR EXTENSION
OF TIME TO ANSWER OR PLEAD [FIRST
REQUEST]; PROPOSED ORDER

1 Defendants APWU-AFL-CIO ("defendant") requests an extension of time to and including
2 August 16, 2011, to file a responsive pleading in accordance with Rule 12, F.R. Civ. P. This is
3 defendant's first request for an extension of time to respond to the complaint. This motion is based
4 on the defendant's need to investigate the factual allegations in the complaint and determine
5 whether there are defenses to the complaint. The plaintiff authorizes the defendants to state that she
6 has no objection to the granting of the extension requested in this motion. A proposed order is
7 annexed.
8

9 DATE: July 27, 2011

10 Richard G. McCracken, SBN 2748
11 McCRACKEN, STEMERMAN & HOLSBERRY

12 - and -

13 Anton Hajjar (Pro Hac Vice pending)
14 O'DONNELL, SCHWARTZ & ANDERSON, P.C.

15
16 By: /s/ Richard G. McCracken
17 Attorneys for Defendant
18 APWU-AFL-CIO

19 IT IS SO ORDERED:
20

21
22 
23 GEORGE W. FOLEY
24 UNITED STATES MAGISTRATE JUDGE

25 DATED: July 29, 2011
26
27
28

CERTIFICATE OF SERVICE

The undersigned certifies that on July 27, 2011, I served the foregoing document described as UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR PLEAD [FIRST REQUEST]; PROPOSED ORDER in this action by sending via first class, postage paid, a true copy thereof, to:

Rosemary Garity
3232 N. Florenza Street
Pahrump, NV 89060

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: July 27, 2011

/s/ Deborah Trujillo
Deborah Trujillo, PLS